

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
 RICHARD F. ALBERT
 ROBERT J. ANELLO*
 KATHLEEN E. CASSIDY
 BENJAMIN S. FISCHER
 CATHERINE M. FOTI
 CHRISTOPHER B. HARWOOD
 LAWRENCE IASON
 BRIAN A. JACOBS
 TELEMACHUS P. KASULIS
 KAREN R. KING
 THOMAS A. MCKAY
 ROBERT M. RADICK*
 JONATHAN S. SACK**
 EDWARD M. SPIRO
 JEREMY H. TEMKIN
 RICHARD D. WEINBERG

565 FIFTH AVENUE
 NEW YORK, NEW YORK 10017
 (212) 856-9600
 FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

tkasulis@maglaw.com
 (212) 880-9520

May 3, 2024

SENIOR COUNSEL

PAUL R. GRAND

COUNSEL

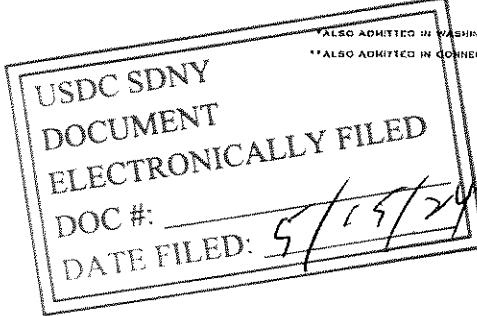
JASMINE JUTEAU

ROBERT G. MORVILLO
 1938-2011

MICHAEL C. SILBERBERG
 1940-2002

JOHN J. TIGUE, JR.
 1939-2009

ALSO ADMITTED IN WASHINGTON, D.C.
 **ALSO ADMITTED IN CONNECTICUT



MEMO ENDORSED

By ECF

Hon. Lewis A. Kaplan
 United States District Court Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007-1312

Re: *United States v. Cyron Lee*,
 23 Cr. 591 (LAK)

Dear Judge Kaplan:

We represent Cyron Lee, a defendant in the above-referenced case. We write to request a bail hearing for Mr. Lee, who is currently detained at MDC Brooklyn ("MDC"). This case is set for trial on June 11, 2024.

Mr. Lee has been incarcerated at the MDC for the past six months. During this period, the MDC has demonstrated that it is unable to provide for Mr. Lee's serious medical needs. In addition, Mr. Lee has found it impossible to meaningfully review the discovery in his case due to the MDC's frequent lockdowns.

While Mr. Lee is subject to a rebuttable presumption of detention based upon the non-violent narcotics charge alleged, he is neither a danger to the community nor a risk of flight. Accordingly, the following substantial conditions should reasonably meet the needs of the Bail Reform Act: (a) a \$75,000 personal recognizance bond; (b) signed by Mr. Lee and three financially responsible people; and (c) home detention with electronic monitoring.

The government opposes this application and requests until May 8, 2024 to file a response.

Memorandum Endorsement

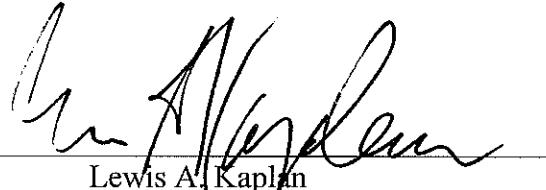
United States v. Lee, 23-cr-591 (LAK)

In view of the government's proffer (Dkt 45), which stands essentially undisputed, the defendant's history of violence and attempts to tamper with witnesses, the length of the sentence to which he would be exposed in the event of conviction, and the firm trial date of June 11, 2024, there is no meaningful case for a bail hearing or for reconsidering the order of detention. On the record before the Court, the presumption of no condition or combination of conditions would reasonably assure the appearance of the defendant or adequately protect the safety of the community. He manifestly would be a flight risk and a menace to the community were he released. And while the Court is sympathetic to his claim of inadequate medical care, the fact remains that he flatly refused transfer to an institution better able care for him.

Motion denied.

SO ORDERED.

Dated: May 15, 2024



Lewis A. Kaplan
United States District Judge